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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

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12 UNITED STATES OF AMERICA,
13 Plaintiff,

14 v.

CASE NO. 2:16-CR-00291-GMN-PAL

15
16 JOHN FORD EPPS,
17 Defendant.
18

19 **SECOND MOTION TO CHANGE PRE-TRIAL CONDITIONS**
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21 COMES NOW JOHN FORD EPPS by and through his attorney John G. George and
22 hereby requests that this honorable court temporarily modify his condition s of release for the
23 purpose of fulfilling a mandate by this Court. This motion is made based on the attached
24 memorandum of points and authorities, the papers and pleadings filed herein and any arguments
25 permitted by the court at a hearing.
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MEMORANDUM OF POINTS AND AUTHORITIES

On September 30, 2016 a complaint was filed naming Defendant EPPS and co-defendants Johnny Tovar, and Marcus Richardson alleging violations of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), Conspiracy to Distribute Heroin. (ECF. No. 1) All defendants were required to avoid contact between themselves. Recently, the other defendants requested in unopposed motions that they be permitted to interact because they were very close before being charged. Those motions were granted.

Defendant Epps was also required by the Court to remedy an outstanding warrant in Los Angeles County for a charge that is many years old. However, Defendant Epps is prohibited from leaving the State of Nevada. He needs to be able to travel to Los Angeles to fulfill the mandate of this Court that he remedy that warrant.

Defendant Epps requests that this Court permit him to visit Los Angeles so that he can address the matter of the warrant. After a discussion with his pre-trial supervisor, counsel believes that it will save imposition on the Court and enable Mr. Epps to successfully address this matter if the Court will permit his pre-trial supervisor to regulate and supervise his travel to California.

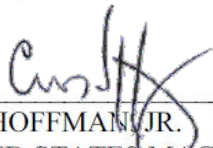
CONCLUSION

Defendant Epps respectfully requests that this honorable Court permit him to travel to Los Angeles and to visit with his co-defendants.

DATED this 8th day of February, 2017.

IT IS SO ORDERED.

DATED: February 9, 2017


C.W. HOFFMAN, JR.
UNITED STATES MAGISTRATE JUDGE

/s/ John George
JOHN G. GEORGE, ESQ.
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Attorney for Defendant John Ford Epps

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of February, 2017, I served a true and correct copy of this Second Motion to Change Conditions of Release addressed to the following party as follows:

 x via Electronic Service: mandatory electronic service (e-service), proof of e-service attached to any copy filed with the Court; or

 via facsimile transmission, proof of transmission attached to any copy filed with the Court; or

 via e-mail, proof of transmission attached to any copy filed with the Court; or

 via U.S. Mail: By placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, addressed as indicated on the service list below in the United States mail at Las Vegas, Nevada to the below address:

Robert Knief
Assistant United States Attorney
United States Attorney's Office
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336

/s/ John George
An employee of
Law Office of John George